

CRAIG H. MISSAKIAN
United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Fax: (415) 436-6748

ERIC J. HAMILTON (CABN 296283)
Deputy Assistant Attorney General

DIANE KELLEHER

Branch Director

CHRISTOPHE

Assistant Branch Director

ANDREW M. BERNIE

CESAR E. AZRAK

MARIANNE F. KIE

Trial Attorneys

Civil Division,

1100 L Street, NW
Washington, DC 20005
Telephone: (202) 353-1819
Marianne.f.kies@usdoj.gov

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs.

V.

DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*

Defendants.

Case No. 3:25-cv-03698-SI

**STIPULATED REQUEST BY
DEFENDANTS FOR EXTENSION OF
TIME TO RESPOND TO OPERATIVE
COMPLAINT**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties hereby stipulate and respectfully
2 request that the Court extend the time for Defendants to respond to the operative complaint, to
3 October 30, 2025. In support of this stipulation, the parties state as follows:

4 Plaintiffs filed an original complaint on April 28, 2025. ECF 1. Plaintiffs amended their
5 complaint on May 14, 2025. ECF 100. The parties stipulated to a three-week extension of the
6 deadline for Defendants to respond to Plaintiffs' amended complaint, to July 21, 2025. ECF 175.
7 On July 21, 2025, Defendants filed a motion to dismiss Plaintiffs' amended complaint. ECF 216.
8 The parties then stipulated to a two-week extension of Plaintiffs' deadline to respond to
9 Defendants' motion to dismiss, until August 18, 2025. ECF 233. Briefing on the motion to dismiss
10 was completed on August 25, 2025. ECF 252. On September 9, 2025, the District Court "denie[d]
11 the motion with the exception that the claims against DOGE are dismissed with leave for plaintiffs
12 to amend to clarify the DOGE allegations" by September 30, 2025. ECF 259 at 1, 13.

13 The parties now respectfully request that the Court extend the time for Defendants to
14 respond to the operative complaint, to October 30, 2025. The proposed extension of time would
15 conserve significant time and resources that would be expended to respond to the first amended
16 complaint, which (in one week from today) will no longer be operative. The proposed extension
17 of time would not affect other case deadlines, as a scheduling order in this case has not yet been
18 entered.

19 In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under
20 penalty of perjury that all signatories have concurred in the filing of this document. Further,
21 pursuant to Civil Local Rule 6-2(a), undersigned counsel for Defendants has submitted a
22 declaration in support of this stipulation.

23
24 A proposed order is attached.
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1 Dated: September 23, 2025

Respectfully submitted,

2 CRAIG H. MISSAKIAN
3 Acting United States Attorney
4 U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495

5 ERIC J. HAMILTON (CABN 296283)
6 Deputy Assistant Attorney General

7 DIANE KELLEHER
Branch Director

8 CHRISTOPHER HALL
Assistant Branch Director

9 s/ Marianne F. Kies
10 Cesar Azrak
11 Andrew Bernie
12 Marianne F. Kies
13 Trial Attorneys
14 United States Department of Justice
15 Civil Division, Federal Programs Branch
16 1100 L Street, NW
17 Washington, DC 20005
18 Telephone: (202) 353-1819
19 Marianne.F.Kies@usdoj.gov

20 *Counsel for Defendants*

1 Dated: September 23, 2025

2 Stacey M. Leyton
3 Barbara J. Chisholm
4 Danielle E. Leonard
5 Corinne F. Johnson
6 Alice X. Wang
7 Robin S. Tholin
8 ALTSHULER BERZON LLP
9 177 Post St., Suite 300
10 San Francisco, CA 94108
11 Tel: (415) 421-7151
12 sleyton@altshulerberzon.com
13 bchisholm@altshulerberzon.com
14 dleonard@altshulerberzon.com

15 By: /s/ Barbara J. Chisholm

16 *Attorneys for All Union and Non-Profit
17 Organization Plaintiffs*

18 Elena Goldstein (pro hac vice)
19 Skye Perryman (pro hac vice)
20 Tsuki Hoshijima (pro hac vice)
21 DEMOCRACY FORWARD FOUNDATION
22 P.O. Box 34553
23 Washington, D.C. 20043
24 Tel: (202) 448-9090
25 Fax: (202) 796-4426
26 egoldstein@democracyforward.org
27 sperryman@democracyforward.org
28 thoshijima@democracyforward.org

29 By: /s/ Tsuki Hoshijima

30 *Attorneys for All Union and Non-Profit
31 Organization Plaintiffs (except NRDC) and for
32 Plaintiffs City of Chicago, IL; Martin Luther King,
33 Jr. County, WA; Harris County, TX; and City of
34 Baltimore, MD*

35 David Chiu (SBN 189542)
36 City Attorney
37 Yvonne R. Meré (SBN 175394)
38 Chief Deputy City Attorney
39 Mollie M. Lee (SBN 251404)
40 Chief of Strategic Advocacy

B

1 Sara J. Eisenberg (SBN 269303)
2 Chief of Complex and Affirmative Litigation
3 Molly J. Alarcon (SBN 315244)
4 Alexander J. Holtzman (SBN 311813)
5 Deputy City Attorneys
6 OFFICE OF THE CITY ATTORNEY FOR THE
7 CITY AND COUNTY OF SAN FRANCISCO
8 1390 Market Street, 7th Floor
9 San Francisco, CA 94102
10 molly.alarcon@sfcityatty.org
11 alexander.holtzman@sfcityatty.org

12 By: /s/ Alexander Holtzman

13 *Attorneys for Plaintiff City and County of San*
14 *Francisco*

15 Tony LoPresti (SBN 289269)
16 COUNTY COUNSEL
17 Kavita Narayan (SBN 264191)
18 Meredith A. Johnson (SBN 291018)
19 Raphael N. Rajendra (SBN 255096)
20 Hannah M. Godbey (SBN 334475)
21 OFFICE OF THE COUNTY COUNSEL
22 COUNTY OF SANTA CLARA
23 70 West Hedding Street, East Wing, 9th Floor
24 San José, CA 95110
25 Tel: (408) 299-5900
26 Kavita.Narayan@cco.sccgov.org
27 Meredith.Johnson@cco.sccgov.org
28 Raphael.Rajendra@cco.sccgov.org
Hannah.Godbey@cco.sccgov.org

22 By: /s/ Tony LoPresti

23 *Attorneys for Plaintiff County of Santa Clara,*
24 *Calif.*

DECLARATION

I declare, under penalty of perjury, that the factual assertions contained in this stipulation are true and correct to the best of my knowledge.

/s/ Marianne F. Kies

Marianne F. Kies

Trial Attorney